

The Honorable Timothy Dore
Chapter 11
Hearing Date: February 9, 2024
Hearing Time: 9:30 a.m.
Place: Seattle, Courtroom 8106
Response Due: February 8, 2024

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re:

STRATEGIES 360, INC.,

Debtor.

CASE NO. 23-12303-TWD

OFFICIAL COMMITTEE OF
UNSECURED CREDITORS' RESPONSE
IN SUPPORT OF DEBTOR'S MOTION
TO AMEND FINAL ORDER (1)
AUTHORIZING USE OF CASH
COLLATERAL AND (2) GRANTING
ADEQUATE PROTECTION

The Official Committee of Unsecured Creditors of Strategies 360, Inc. ("Committee") hereby submits this response in support of the Debtor's *Motion to Amend Final Order (1) Authorizing Use of Cash Collateral and (2) Granting Adequate Protection* (the "Motion"). The Committee is currently working with the Debtor toward an agreeable plan of reorganization that it hopes will allow for full repayment of all of the Debtor's creditors. While the Committee has significant concerns regarding the disclosures made by the Debtor in conjunction with the Motion, the Committee is primarily concerned with ensuring that the Debtor is able to continue operating its business while a plan of reorganization can be finalized and ultimately confirmed. Continuing those operations requires the Debtor to retain access to cash collateral; the Committee therefore supports the Debtor's request to amend the cash collateral order. The Committee understands that

CREDITORS' COMMITTEE'S RESPONSE IN SUPPORT OF
MODIFICATION OF CASH COLLATERAL – 1

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A Professional Limited Liability Company
155 NE 100th Street, Suite 205 Seattle, WA 98125
p: 206.489.3802 | f: 206.973.8737

1 the Debtor will be submitting an amended proposed order granting the Motion that will make the
2 Court's approval interim; the Committee has requested and supports the modifications to the
3 proposed order, which will allow the Committee (and other interested parties) the opportunity to
4 further analyze the Debtor's recent budget variances and to discuss ways to further revise the
5 Debtor's final budget in order to ensure it can perform thereunder.
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7 The Committee asks the Court to grant the Debtor's request on the terms to be set forth in
8 the revised proposed order.

9 DATED this 8th day of February 2024.
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13 /s/ Dominique R. Scalia

14 Daniel J. Bugbee, WSBA No. 42412

15 Dominique R. Scalia, WSBA No. 47313

16 *Attorneys for the Official Committee of*
17 *Unsecured Creditors*
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